

U.S. DISTRICT COURT  
EASTERN DISTRICT - WI  
UNITED STATES DISTRICT COURT FILED

2022 JAN 25 A 11:47

EASTERN DISTRICT OF WISCONSIN

CLERK OF COURT

JACK A. CLAYBORNE,

plaintiff,

v.

Case No. 22-cv-0095

DOCTOR BODIWALLA, CHRISTINA ANN STETCHER

BORYCZKA, DEBRA KNISBECK, WELL PATH MEDICAL

PROVIDER, SERGEANT J. POLSIN, SGT. KUEHL,

DEPUTY JAIL ADMINISTRATOR HUNDT, JAIL

ADMINISTRATOR BRUGGER

Defendants.

COMPLAINT

## A. PARTIES

1. plaintiff is a citizen of Wisconsin, and is located at Waukesha County Jail, 515 W. Moreland Blvd, Waukesha WI 53188

2. Defendants Doctor Godiwalla et al. Worked for Wellpath Medical provider and Dodge County Detention

Facility located at 216 W. Center St, Juneau, WI 53039.

## B. STATEMENT OF CLAIM

I was injured during a Beatdown / Excessive use of Force, I received from HIDTA officers in 2018.

I was taken to the Hospital to see if I had any damage to my Organs and I think an

X-RAY.

I was transferred to Milwaukee County Jail and was seen by Nurses and Doctors and I was prescribed medicine for Head, Neck, Shoulder and Back pain. I was also given another X-RAY for my Shoulder, I was eventually given therapy for my Shoulder which was believed to be a Tendon or Muscle. As soon as I had completed approximately two therapy sessions in Milwaukee County Jail, I was transferred to Dodge County Detention Facility in September 2019.

When I got to Dodge County Detention Facility, (DCOF), I explained to Doctor Godinwalla and Medical Staff there that I was taking pain

Medication and receiving therapy for my Shoulder

in Milwaukee County Jail. Doctor Godiwala

decided to give me Ibuprofen for pain Medication

(No Therapy). I further & later explained to

Doctor Godiwala that the pain Medication was

not fixing the problem with my Shoulder and

that I was still in pain. I was then given

a different Medication (for Arthritis) to which

I was told to try for 6 months, which I

tried, it did not work, so I informed the

Nurse practitioner (Debra Knisbeck) on 03-09-21,

that the medication was not fixing the problem

with my Shoulder and that I was still in

Pain. I was then given Ibuprofen again for pain medication and told that there was nothing to be done. I filed grievances on 3-9-21, which was unfounded by #132 Sgt. Polsin on 3-25-21. I then filed an Appeal on 3-25-21 and was unfounded by #105 Hundt on 4-8-21. I filed a 2nd Appeal on 4-9-21 and on 4-23-21 Jail Administrator Brugger informed me that the Doctor would be here Wednesday, April 28<sup>th</sup> and that I may put in a request for a visit. I filled out another slip to See Medical regarding my Shoulder and it took over a month to be seen. When I was finally

Seen on 6-9-21, I was seen by Doctor Christina Ann Stetzer Boryczka, who told me that there was nothing to be done except doing the same things I've been trying, like taking the Medication, Stretching, Rotating Exercises etc.etc., to which I explained repeatedly that none of those things were fixing the problem I have with my shoulder and that I was still in pain. On 6-9-21 I filed a grievance and it was unfounded by #138 Sgt. Kuehl on 6-16-21. I then filed an Appeal on 6-16-21, which was unfounded by #105 Hundt on 6-28-21. I Filed a 2nd Appeal on 6-29-21 and received a Response from Jail Administrator

Bruegger on 7-13-21 stating "I have consulted with Medical and have no reason to question your care". It should be noted that I have exhausted all available remedies.

I've been experiencing a feeling that my shoulder is dislocated, it constantly pops/cracks all the way from my right shoulder to my left shoulder possibly my collarbone. It hurts and feels like its popping in and out of place all day for no reason. I've tried resting it, stretching it, rotating it, working out light, etc. etc. Nothing is working to fix the problem with my shoulder or the pain.

I've been seen by Doctor Godiwalla, Debra Knisbeek and Christina Ann Stetcher Boryczka and all have stated the same, no matter how much I pleaded the problems and pain I have with my shoulder and for someone that's experienced in this area to look at my shoulder.

The actions stated herein are Medical Malpractice, Deliberate Indifference - To my shoulder problems and pain, Delaying Treatment, Undue prolonging of pain/physical suffering among other things, by Doctor Godiwalla, Debra Knisbeek, Doctor Christina Ann Stetcher Boryczka and Wellpath Medical provider. Which is in violation of my

Fourteenth Amendment Rights. Among being in violation of other Rights, Statues, Amendments, Laws, Regulations and Rules.

I also believe that all of the Scts, DJA and the JA (whom I've mentioned) share some responsibility, due to them covering up the Constitutional violations using their position of Authority at (DCDF).

#### C. JURISDICTION

- I am suing for a violation of Federal Law under 28 U.S.C. ss 1331.

#### D. RELIEF WANTED

I am requesting a temporary or permanent

Injunction for:

1. For Doctor Bodawalla, Nurse practitioner  
Pebra Knisbeck, Doctor Christina Ann Stetzer  
Boryczka and Wellpath Medical provider to Stop  
being Deliberately Indifferent to Serious Medical  
Needs.

2. For Sgts, J. Polson and Kuehl, The DJA  
Hundt and JA Brusser to Stop covering up  
the Constitutional Violations using their position  
of Authority at DCDF.

The plaintiff is suing all responsible in their  
personal/individual and official Capacity. The  
plaintiff is suing for physical and psychological

damages. The plaintiff will also be seeking Two  
Hundred and Fifty Thousand /250,000.00 in  
Compensatory, Nominal and punitive Damages,  
Amongst other things he has rights to request.

#### E. JURY DEMAND

I want a Jury to hear my Case

- YES

I declare under the penalty of perjury that  
the foregoing is true and correct.

Complaint signed this 23rd day of January 2022.

Respectfully Submitted, Jack A. Clayborne



# 1808275

Waukesha County Jail

515 W. Moreland Blvd.

Waukesha, WI 53188